

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

LTJ ENTERPRISES, INC.

Case No. 13-cv-02224-ADM-LIB

Plaintiff,

v.

**DEFENDANT CUSTOM MARKETING  
COMPANY, LLC'S MOTION TO STRIKE  
EXPERT OPINION OF JOHN TITUS**

CUSTOM MARKETING COMPANY, LLC,

Defendant.

Defendant Custom Marketing Company, LLC ("CMC") moves the Court for an order striking the expert opinion of plaintiff LTJ, Inc.'s expert John Titus as follows:

1. Striking the Expert Report of John Titus and precluding testimony thereto; and
2. Striking the Declaration of John Titus [Docket No. 64]; and
3. Such other relief as the Court deems just and equitable.

This motion is based upon all the files, records and proceedings herein, including defendant CMC's supporting memorandum of law and Declaration of Donald W. Niles Relating to CMC's Motion to Strike submitted herewith.

Dated: November 11, 2015

**Niles Law Office, P.A.**

s/Donald W. Niles  
Donald W. Niles (160684)  
121 Colfax Ave. SW  
Wadena, MN 56482  
Tel. 612-296-7788  
Fax: 888-644-8522

**ATTORNEY FOR DEFENDANT  
CUSTOM MARKETING COMPANY, LLC**